

## **REMARKS/ARGUMENTS**

Reconsideration of this application, as amended, is respectfully requested. The following remarks are responsive to the Office Action of June 29, 2004. Applicants appreciate the allowed subject matter in claims 74 and 75. Claims 74 and 75 have been amended to address a minor typographical error common to each claim. Claim 73 has been amended to address the current rejection based on the cited art. The above amendments are supported by the Specification as filed. Accordingly, no new matter is added.

Claim 73 has been rejected under 35 U.S.C. 102(e) as allegedly being anticipated by Gates et al., U.S. Pat. No. 6,203,613 (hereinafter "Gates"). Gates describes an atomic layer deposition process using a metal nitrate-containing precursor and various other agents to deposit a metal film on a substrate. Every ALD example discussed in Gates included the use of metal nitrate-containing precursors. However, claim 73 has been amended to include the feature of an insulating layer formed on an existing atomic layer deposition layer in which the insulating layer is pretreated by introducing a radical specie including any combination of O<sub>2</sub>, H<sub>2</sub>, H<sub>2</sub>O, NH<sub>3</sub>, NF<sub>3</sub>, N<sub>2</sub>, Cl and F to increase AH<sub>x</sub> termination sites on the surface of the insulating layer, where x is an integer and A is a non-metal capable of bonding with hydrogen H.

As indicated by the Examiner with respect to the allowability of claims 74 and 75, the prior art does not anticipate or render obvious the feature of depositing an insulator layer on an ALD deposited insulating layer. Although claim 73 does not claim the ALD deposited layer as an insulating layer, nowhere in the prior art does it discuss an insulating layer formed on an existing ALD (atomic layer deposition) layer. Consequently, claim 73 is patentable over the cited art.

For all of the foregoing reasons, the claims are patentable over the references cited in the Office Action. If there are any additional fees due in connection with this communication, please charge our deposit account no. 02-2666.

Respectfully submitted,

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Dated: 10/20, 2004

  
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